

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

AUDREY L. CASH, a/k/a  
AUDREY MOORE,

Defendant.

Case No. 20-51458

Related Case Nos: 77-80068  
and. 77-80169

Hon. George Caram Steeh

ORDER DENYING MOTION FOR EXPUNGEMENT

Audrey Moore wrote a letter to the court seeking expungement of her criminal record from 1977, which the court construes as a motion. In Case No. 77-80169, Moore pleaded guilty to mail fraud and was sentenced to one year of probation. In Case No. 77-80068, Moore was charged with making false statements to the government and mail fraud, but the charges were dismissed after she pleaded guilty in Case No. 77-80169. Moore seeks expungement because her record is an impediment to the renewal of her concealed pistol license.

In general, “[t]he view among federal courts is that records of valid arrests, indictments, or convictions ordinarily may not be expunged.” *United States v. Flagg*, 178 F.Supp.2d 903, 905 (S.D. Ohio 2001). The court has

jurisdiction over expungement motions that “challenge an unconstitutional conviction or an illegal arrest or are otherwise based upon a constitutional claim.” *United States v. Field*, 756 F.3d 911, 915 (6th Cir. 2014). However, “federal courts lack ancillary jurisdiction over motions for expungement that are grounded on purely equitable considerations – e.g., motions alleging that the movant has maintained good conduct and that the record of arrest harms the movant’s employment opportunities.” *Id.*

Moore’s request is based upon equitable considerations – that her record presents an obstacle to the renewal of her CPL. As presented, Moore’s request does not fall into the limited category of expungement cases over which the court may have jurisdiction. Accordingly, IT IS HEREBY ORDERED that Moore’s request is DENIED.

Dated: December 2, 2020

s/George Caram Steeh  
GEORGE CARAM STEEH  
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

Copies of this Order were served upon attorneys of record on December 2, 2020, by electronic and/or ordinary mail and also on Audrey L. Moore, 12827 Sparling St., Hamtramck, MI 48212.

s/Brianna Sauve  
Deputy Clerk